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February 6, 2023

**BY ECF AND EMAIL**

The Honorable Analisa Torres  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007  
Torres\_NYSDChambers@nysd.uscourts.gov

**Re: Proskauer Rose LLP v. O'Brien, No. 1:22-CV-10918-AT (S.D.N.Y.)**

Dear Judge Torres,

We represent Plaintiff Proskauer Rose LLP in the above-referenced action.

The parties have conferred and have reached a resolution concerning Defendant Jonathan O'Brien's Emergency Motion for a Proposed Order to Show Cause Why a Protective Order Should not be Issued Preventing Proskauer from Viewing Certain of Mr. O'Brien's Information on his Firm-Issued iPhone [ECF No. 54].

We submit the accompanying Stipulation and Proposed Order for Your Honor's consideration, which *inter alia* withdraws Defendant's motion and requests that the Court close ECF Nos. 54 and 56–58.

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP

/s/ Jyotin Hamid  
Jyotin Hamid